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May 10, 2023

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## VIA ECF

The Honorable Colleen McMahon United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Shawna Collins v. Hanesbrands Inc.

Case 1:23-cv-01818

Letter Motion for an Adjournment of Initial Conference

Your Honor:

Per the Court's Individual Practice and Procedures, Defendant Hanesbrands Inc. respectfully submits this letter motion for an adjournment of the May 18, 2023 initial conference and the deadline to submit a case management plan. The parties have met and conferred on the below and Plaintiff joins and consents to this request.

Defendant's deadline to file a responsive pleading to Plaintiff's Complaint is presently due on May 23, 2023. Defendant intends to file a motion to dismiss on that date. The parties agree that Plaintiff will have 30 days to file an opposition brief (June 22, 2023) and Defendant will have 21 days to file a reply (July 13, 2023). Accordingly, the parties respectfully request an adjournment of the initial conference and deadline to file a case management plan until the motion is fully briefed.

This is Defendant's first request for an adjournment of the initial conference. Defendant's request is not made for the purpose of delay but for good cause and in the interest of justice. Additionally, the undersigned will be out of the country on his honeymoon on May 18, 2023.

Thank you for Your Honor's consideration of the above.

Sincerely,

/s/ Timothy Barbeta
Timothy Barbetta
Counsel for Hanesbrands Inc.